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ADMITTED TO THE UNITED STATES  
SUPREME COURT BAR (1996)

“A VETERAN OWNED LAW FIRM”

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September 23, 2021

**VIA, ELECTRONIC MAIL AND ELECTRONIC FILING**The Honorable Jocelyn G. Boyd  
Chief Clerk/Executive Director  
Public Service Commission of South Carolina

- Re:   • Docket 2021-88-E - Dominion Energy South Carolina, Incorporated's 2021  
Avoided Cost Proceeding Pursuant to S.C. Code Ann. Section 58-41-20(A)  
• **Reply to LEI's Response of September 22, 2021**

Ms. Boyd:

I write on behalf of the Carolinas Clean Energy Business Association ("CCEBA"), which has been granted Intervenor status in the above-referenced Docket.

I filed a Motion yesterday in the above-referenced Docket on behalf of CCEBA, to shorten the time for a response by London Economics International, LLC ("LEI"), to CCEBA's pending Discovery Request, from 20 days to 9 days. LEI filed a response to CCEBA's Motion, also yesterday.

In the spirit of compromise and in the interests of giving LEI additional time to respond to CCEBA's pending Discovery Requests, please consider the following proposed compromise to CCEBA's pending Motion:

1. The discovery deadline in Docket 2021-88-E is currently **October 5, 2021**.
2. CCEBA's Witness, Ed Burgess' Supplemental/Surrebuttal Testimony is currently due on **October 5, 2021** [at noon].
3. We propose that the date for LEI to respond to CCEBA's just submitted Discovery Request be **October 4, 2021**, instead of our previously proposed response date of October 1, 2021.
  - That will give LEI, **12 days** to respond, instead of **9 days**.
  - CCEBA's Witness, Eb Burgess' Supplemental/Surrebuttal Testimony will be due on **October 8, 2021**, [at noon] instead of October 5, 2021 [at noon].

LEI is copied hereon, please review this proposed compromise and advise.

Respectfully Submitted,

/s/Richard L. Whitt,

Richard L. Whitt,

*As Counsel to the Carolinas Clean Energy Business  
Association.*

cc: All parties of record in Docket 2021-88-E, *via electronic mail*